

3 May 2019

Darya Fatah
City of Parramatta Council
Via email: dfatah@cityofparramatta.nsw.gov.au

Addendum to Auto Alley Precinct Preliminary Site Investigation

Dear Darya,

1. Introduction and Background

JBS&G Australia Pty Ltd (JBS&G) was engaged by the City of Parramatta Council (Council, the client) for the provision of contamination advice in relation to the review of a Preliminary Site Investigation (PSI, JBS&G 2016¹) for the Parramatta Auto Alley precinct (the site). The site location and layout are shown on **Figures 1** and **2**, respectively.

The NSW Department of Planning and Environment (DPE) have issued a conditional Gateway Determination for the Parramatta CBD Planning Proposal. In order to progress the planning proposal, Council is required to undertake further work to refine the planning proposal prior to public exhibition.

Given the lapse in time since issue of the PSI (JBS&G 2016) and the delay with receiving the Gateway Determination, the DPE has issued a condition – Condition 1 (h) that requires Council to review the supporting studies and update if required, as per the excerpt below:

- *“Condition 1 (h) update the planning proposal and maps to provide a consolidated explanation of provisions and assessment of the intended outcomes as amended by this Gateway determination, and review the studies that have been prepared to support the planning proposal and update if required”.*

To satisfy this Gateway Determination Condition 1 (h), this addendum letter reviews the Parramatta CBD Planning Proposal and recent amendments for the Parramatta Auto Alley precinct, the PSI (JBS&G2016) prepared for the site and provides a clear statement with respect to the findings of the PSI (JBS&G 2016).

2. Review of Auto Alley Precinct - Preliminary Site Investigation (JBS&G 2016)

JBS&G (2016) reported the site was highly accessible, generally had large allotments, and was largely occupied by car yards and associated uses including car washing facilities and repair and supply outlets. Church Street, the main north south retail street, divided the site. Modern car showrooms generally line the Church Street road frontage with associated repair and supply outlets generally fronting east west orientated streets. A large hotel, The Holiday Inn, was located in the north eastern portion of the site. Several residential and commercial outlets (cafes and pub) were scattered across the site.

¹ Parramatta City Council Preliminary Site Investigation – Auto Alley Precinct, Parramatta LGS, NSW, 2150. JBS&G Australia Pty Ltd dated 26 February 2016 reference 43375/57854 (JBS&G 2016)

Based on the findings of this investigation the following conclusions were made:

- The site has a long history of commercial land use as a car dealership and automotive repairs precinct.
- Based on information provided by Council, it was understood that the site (which contains some 90 plus separate allotments) was proposed to be rezoned to allow more sensitive land uses, including high density residential and commercial uses and new parks to service the future residents/workforce in the precinct.
- A site history review and a limited site inspection of accessible areas identified potential for contamination to exist at the site. Qualitative risk assessment resulted in risk levels for the identified areas of environmental concern (AEC) and associated contaminants of potential concern (COPC). The majority of the site was assessed as being of moderate to high risk of potential contamination.
- Whilst the investigation identified the potential for soil and groundwater impacts to be present at the site, the investigation did not identify the potential for gross or widespread contamination which may preclude rezoning of the site. Identified potential soil and groundwater impacts were considered representative of common contaminants and potentially contaminating land use activities which can be readily dealt with during the development application (DA) stage (i.e. including completion of preliminary and detailed site investigations consistent with relevant Council development control plans (DCPs) and SEPP 55² requirements) for redevelopment and assessment for site suitability.
- In the absence of gross or widespread contamination, the requirements of the DUAP/EPA (1998) *Managing Land Contamination: Planning Guidelines* for this type of rezoning were considered to have been satisfied, namely that the rezoning can proceed, “*provided that measures are in place to ensure that the potential for contamination and the suitability of the land for any proposed use are assessed once detailed proposals are made*” (s.4.1.2 DUAP 1998).

Review of aerial photographs and EPA records for the intervening period since issue of the PSI (JBS&G 2016) did not identify any significant material changes from that documented in the PSI (JBS&G 2016). As discussed in **Section 3.1**, some relatively minor additions/alterations to the built form were apparent.

3. Site Inspection and Document Review

3.1 Site Inspection

A site inspection from public pedestrian pavements was conducted on 30 April 2019 by one of JBS&G’s trained and experienced environmental consultants.

The site was noted to be similar to that documented in JBS&G (2016) with the exception of:

- A number of minor additions/alterations to existing site structures and ground surface pavements were apparent;
- Several car dealerships changed ownership and/or vehicle make (brand) supply;

² *Managing Land Contamination. Planning Guidelines SEPP 55 – Remediation of Land. Department of Urban Affairs and Planning. Environment Protection Authority 1998 (SEPP 55)*

- Minor additions/alterations to what was known of PJ's Irish Pub, now known as General Bourke Pub. A modern electrical pad mounted substation was apparent within the south western portion of this property (**Figure 2**);
- The former commercial building in Parcel S (Lonestar Steakhouse) was no longer apparent, with the site comprising a vacant land parcel secured by wooden construction palings;
- A modern electrical pad mounted substation was apparent within eastern portion of Parcel U (Lot 102 DP 1054466), as shown on **Figure 2**;
- Parcel Z – Café rebranded from Oasis to Tayfur Chefs; and
- Car dealership activities within Parcel AB were no longer apparent with the site vacant and secured by wooden construction palings. A modern electrical pad mounted substation was apparent within the eastern portion of Lot 1 DP 816376 as well as two suspected risers potentially associated with underground petroleum storage systems, as shown on **Figure 2**.

3.2 Parramatta CBD Planning Proposal³ and Amend Parramatta Local Environmental Plan 2011⁴

The planning proposals seeks to introduce a range of planning controls within the Parramatta CBD through the following amendments to the Parramatta Local Environmental Plan (LEP) 2011:

- Expand and define the CBD boundary;
- Amend the permitted land uses within B3 Commercial Core and B4 Mixed Use zones;
- Exempt commercial development within the B3 Commercial Core from maximum floor space ratio controls;
- Review the height and floor space ratio mapping;
- Introduce a range of height and floor space ratio incentives via specific clauses to achieve planning, heritage, environmental and urban design outcomes;
- Amend the floor space ratio sliding scale and introduce an out-clause to waive floor space ratio sliding scale provisions in certain circumstances;
- Introduce 'opportunity sites' to the CBD;
- Introduce a solar plane access control to protect public domain in the Parramatta CBD from overshadowing;
- Introduce a mechanism to fund local (community) infrastructure; and
- Introduce a new flood planning clause to apply development controls to land affected by the probable maximum flood.

The planning proposals also seek to clarify/amend inconsistencies within the Gateway documentation and require consultation with public authorities to further refine the planning proposals.

With regards to the subject site, from a land contamination perspective, the proposed amendments have resulted in some minor adjustments to the proposed land zoning. Review of the proposed land zoning amendments and identified AECs and associated COPC with the qualitative risk assessment

³ Parramatta CBD Planning Proposal: Gateway Determination Report November 2018

⁴ Planning Proposal PP_2017_COPAR_002_00 to amend Parramatta Local Environmental Plan 2011

presented in JBS&G (2016) has resulted in risk levels being of a moderate to high risk of potential contamination, consistent with the findings of the PSI (JBS&G 2016).

The proposed changes to the LEP do not have any material change to the finding of the PSI (JBS&G 2016).

3.3 Preliminary Site Investigation 18-40 Anderson St (Parcel T) (Cardno 2018⁵)

Council provided JBS&G a PSI report for land at 18-40 Anderson Street, Parramatta. Cardno (2018) reported that prior to the establishment of the Holiday Inn in 1991 land use comprised car dealerships prior to which the site was occupied by residential dwellings, consistent with the findings of JBS&G (2016).

Cardno (2018) reported the land (identified by JBS&G 2016 as Parcel T) was proposed to be developed for mixed land use (commercial suites, hotel, residential apartments, retail and recreational areas).

Based on the finding of the detailed site inspection and desktop review Cardno concluded there did not appear to be any significant sources of contamination present, and the following was recommended:

- Any future works involving soil disturbance should incorporate an unexpected finds protocol to facilitate the identification and management of potential land contamination (if encountered);
- Soil requiring off site disposal is required to be in accordance with the NSW EPA *Waste Classification Guidelines* (EPA 2014⁶); and
- Obtain a dangerous good certificate to confirm the presence/absence of historical/current petroleum and/or chemical storage/handling.

4. Conclusions and Recommendation

Based on review of the PSI (JBS&G 2016) and in conjunction with reviews noted above and site inspection, it is considered that the findings of PSI (JBS&G 2016) remain valid. That is, whilst the investigation identified the potential for soil and groundwater impacts to be present at the site, it did not identify the potential for gross or widespread contamination which may preclude rezoning of the site.

The relatively minor changes in site conditions and the proposed changes to the LEP do not have any material change to the finding of the PSI (JBS&G 2016).

Identified potential soil and groundwater impacts are considered representative of common contaminants and potentially contaminating land use activities which can be readily dealt with during the DA stage (i.e. including completion of preliminary and detailed site investigations consistent with relevant Council DCPs and SEPP 55 requirements) for redevelopment and assessment for site suitability.

In the absence of gross or widespread contamination, the requirements of the DUAP/EPA (1998) *Managing Land Contamination: Planning Guidelines* for this type of rezoning are considered to have been satisfied, namely that the rezoning can proceed, “provided that measures are in place to ensure that the potential for contamination and the suitability of the land for any proposed use are assessed once detailed proposals are made” (s.4.1.2 DUAP 1998).

⁵ *Preliminary Site Investigation 18-40 Anderson St Paramatta*. Cardno dated 28 February 2018 (Cardno 2018)

⁶ *Waste Classification Guidelines: Part 1 Classifying Waste*. NSW EPA 2014 (EPA2014)

It is recommended that upon submission of development application(s) within the site, Council enact their development control plan, which incorporate SEPP 55 provisions. Specifically, it is recommended that a preliminary and detailed site investigation be undertaken upon submission of DA for redevelopment of any land within the site.

It is also recommended that Hazardous Building Material Surveys (HBMS) be undertaken prior to any demolition and redevelopment works on individual land parcels.

Based on the findings of this review and subject to the limitations in **Attachment A**, it is considered that the findings of the PSI (JBS&G 2016) do not need updating.

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email ncussen@jbsg.com.au.

Yours sincerely:



Nathan Cussen
Associate, Environmental Consultant
JBS&G Australia Pty Ltd

Reviewed/Approved by:



Matthew Bennett, CEnvP SC
Senior Principal, Environmental Consultant
JBS&G Australia Pty Ltd

Attachment A: Limitations

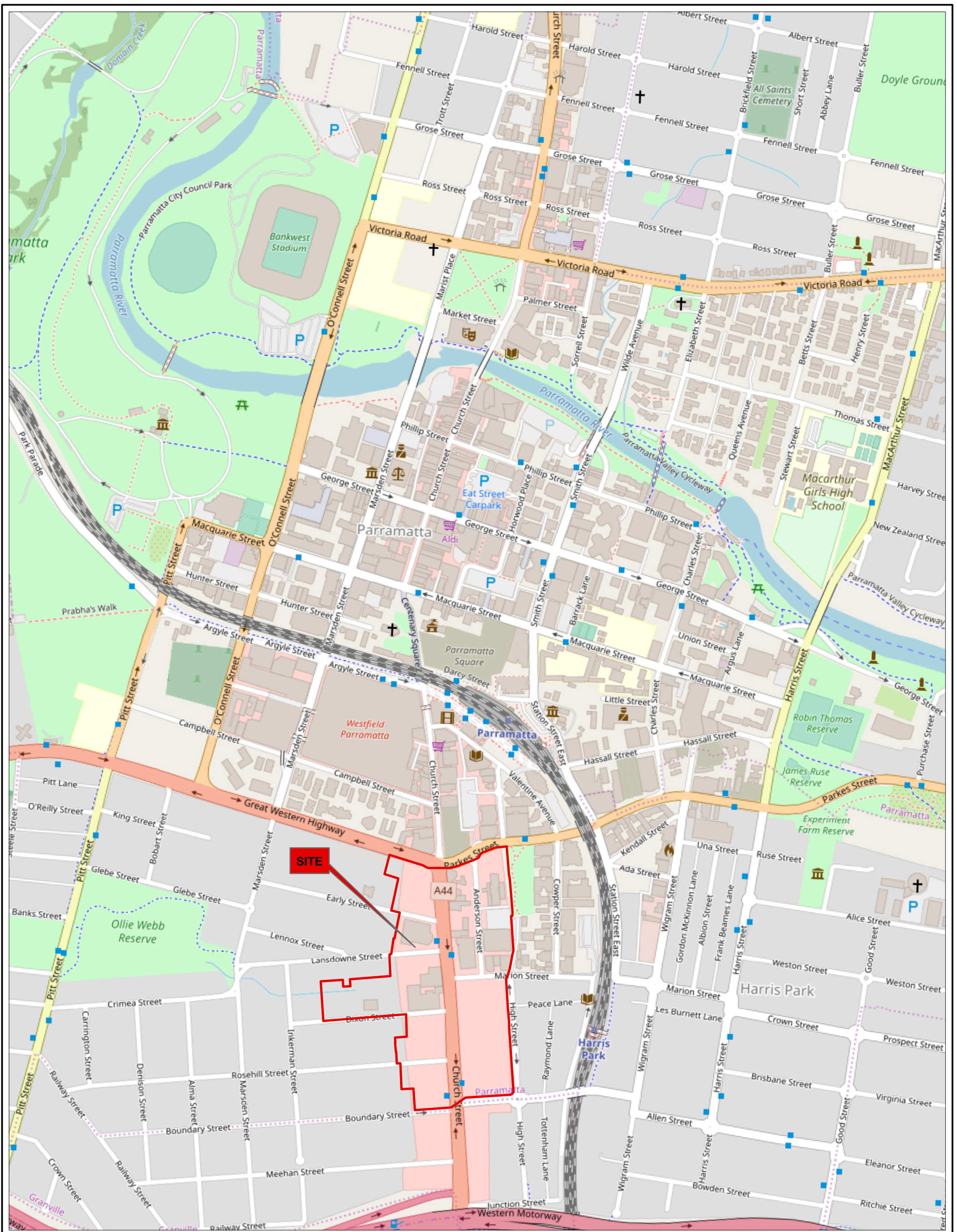
Attachment A: Limitations

This report has been prepared for use by the client who commissioned the works in accordance with the project brief only and has been based in part on information obtained from other parties. The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

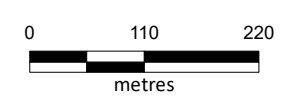
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Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.



Legend:
 Approximate Site Boundary



QLD Tenements - Hay Point Coal Terminal
SITE LOCATION

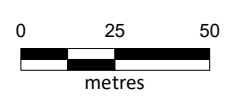
Job No: 54891	Scale: 1:7,250	↑	
Client: BHP Billiton	Coord. Sys. GDA 1994 MGA Zone 55		
Drawn By: RF	Checked By: SD	Version: Misc	Date: 30-Apr-2019

FIGURE 1

File Name: 56123_01_SiteLocation - Copy
 Reference: Service Layer Credits: © OpenStreetMap (and) contributors, CC-BY-SA



- Legend:**
- Approximate Site Boundary
 - Area Not Included in Current Assessment
 - AEC - Riser/Vent (suspected)
 - + AEC - Riser/Vent
 - AEC - Bowser/Pump (suspected)
 - AEC - Bowser/Pump
 - ◆ AEC - PAD Substation
 - Clay Cliff Creek
 - AEC - ACM (suspected)
 - AEC - ACM (visible)
 - AEC - AST
 - AEC - UST (suspected)
 - AEC - UST (former)
 - AEC - UST
 - Land Use



Auto Alley
Church Street
Parramatta, NSW

**SITE LAYOUT
AND FEATURES**

Job No: 56123

Scale: 1:2,000

Client: Parramatta City Council

Coord. Sys. GDA 1994 MGA Zone 56

Drawn By: RF

Checked By: NC

Version: L01 Rev 0

Date: 03-May-2019

FIGURE 2

File Name: N:\Projects\Parramatta City Council\56123 Auto Alley PSI Review 2109\GIS\Maps\L001 Rev 0\56123_02_SiteLayout_Features.mxd
Reference: Service Layer Credits: © Department of Finance, Services & Innovation 2017